PENNSYLVANIA DER

MODULE 1
REQUEST FOR APPROVAL TO TREAT, STORE, OR DISPOSE OF A HAZARDOUS WASTE STREAM

Before completing this form, read the step-by-step instructions provided with this form.

Application Fee

Check No. _____

Amount $ _____

DER USE ONLY

Application or Facility ID# _____

Stamp Date Application Received

SECTION A. FACILITY AND GENERATOR INFORMATION (must be completed by TSD facility)

1. Treatment, Storage, or Disposal Site

a. Name of facility Mill Service, Inc.

Address R.D. #1, Box 135A Cemetery Rd., Yukon, PA. 15698

Municipality South Huntingdon Township County Westmoreland

b. Identification number PAD 004 835 146

c. Hazardous waste permit number(s) for treatment, storage or disposal facility to be utilized

d. Facility contact person

Name Harry Fleming Title Director of Operations

Telephone Number (724) 722-3500

2. Generator of the Waste

a. Name of company U.S. Environmental Protection Agency

Mailing address 1650 Arch Street, Philadelphia, PA 19103-2020

Location of site if different from mailing address 12th Street, Wilmington, DE (Removal Action)

Municipality Wilmington County New Castle

b. If a subsidiary, name of parent co.

c. Identification number DEP 000 001 677

d. Company contact person

Name Mike Towle Title On-Scene Coordinator

Telephone Number (215) 814-3272

a. pH range 5 to 9 (based on analyses or knowledge)

b. Physical state:

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(1) ☐ liquid waste (EPA Method 9095)
(2) ☑ solid (EPA Method 9095)
(3) ☐ gas (ambient temperature and pressure)

c. Physical appearance:

Color Brown Odor NONE

Number of solid or liquid phases or separation 0

Describe each phase of separation.

d. U.S. DOT proper shipping name UN/NA number, and hazard class (if applicable):

Hazardous Waste Solid N.O.S. (Lead), 9, NA3077, PG III, ERG#171

e. Typical volume of waste to be shipped to treatment storage or disposal facility:
(1) Monthly 740 gal., (tons) pounds (circle one)
(2) Annually _____ gal., tons, pounds (circle one)

f. Treatment or disposal frequency: _____ time per year; ☑ one time

g. Current volume to be shipped to treatment, storage or disposal facility
740 gal., (tons) pounds (circle one)

h. Describe the hazardous waste according to its description and hazardous waste number in Chapter 261.

D008, Lead

2. Chemical Analyses - *Please attach the following*:

a. The results of the analysis of the waste as described in the instructions.

b. A description of the sampling method.

c. The substantiation for a confidentiality claim, as described in the instructions, if portions of the information you have submitted are confidential.

3. Process Description and Schematic - *Please attach the following*:

a. The substantiation for a confidentiality claim as described in the instructions, if portions of the information you have submitted are confidential.

b. A detailed description of the manufacturing and/or pollution control processes producing the hazardous waste as specified in the instructions.

c. A schematic of the manufacturing and/or pollution control processes producing the hazardous waste as specified in the instructions.

SECTION D. PROPOSED TREATMENT, STORAGE, AND/OR DISPOSAL METHOD

(must be completed by TSD facility. Use additional sheets if necessary.)

1. Proposed Treatment Method

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2. Proposed Storage Method and Length of Storage

Upon receipt, the waste will be unloaded into a tank and treated. Following treatment, the waste will be stored for approximately 24 hours while the effectiveness of the treatment process is confirmed.

3. Proposed Disposal Method

Disposal as a residual waste in a permitted facility.

SECTION E. ALTERNATIVES TO PROPOSED TREATMENT AND/OR DISPOSAL METHOD

(must be completed by generator. Use additional sheets if necessary.)

1. What Other Treatment, Disposal, Recycle, Reuse, or Reclamation Method(s) Can be Used? Briefly describe viable alternatives to your proposal.

No other cost effective method available

2. Why was the Treatment and/or Disposal Method in Section D Chosen?

Best available technology

SECTION F. SOURCE REDUCTION STRATEGY

(Form 25 R must be completed by generator and attached to this application as specified in the instructions.)

SECTION G. CERTIFICATION OF GENERATOR

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based upon my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name of Responsible Official Mike Towle Title On-Scene Coordinator

Signature [signature] Date 12-14-00

Taken, sworn, and subscribed before me, this 14 day of December A.D. ~~19~~ 2000

Notary Seal

Theresa M. Barecki

Commission Expires 1-19-02

This is to certify that I have personally reviewed all engineering information contained in the accompanying modules, drawings, specifications, and other documents which are part of this application and that I have found it to be of good engineering quality, true, and correct, and is in conformance with the requirements of the Department of Environmental Resources, and it does not, to the best of my knowledge, withhold information that is pertinent to a determination of compliance with the requirements of the Department.

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NOTICE: It is an offense under Pennsylvania Crimes Code to affirm a false statement in documents submitted to the Department.

Name Henry A. Springer, Jr.

Signature _____

Date _____

Address R.D. #1, Box 135A

Yukon, PA. 15698

Phone No. (724) 722-3500

SEAL OF PA REGISTERED
PROFESSIONAL ENGINEER

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Mill Service, Inc.
1815 Washington Road
Pittsburgh, PA 15241-1498

This is to certify that based on "Generator's Knowledge" the waste described below does not exhibit the following hazardous waste characteristics per 40 CFR(261.20-261.24).

D012 thru D017 D001/Ignitability D009 Mercury
D018 thru D043 D003/Reactivity

In addition, the waste does not contain more than 2 parts per million PCB's and is not a listed waste [(F, K, P or U per 40 CFR(261.31-261.33)]. The following parameters do not exist in waste unless checked below:

Hazardous Constituents	CCVOC[1]
Acenaphthene	
Acetonitrile	X
Acrolein	X
Aldrin	
Anthracene	
beta-BHC	
Benz(a)anthracene	
Benzo(a)pyrene	
Benzo(g,h,i)perylene	
bis(2-Chloroisopropyl)ether	X
Bromomethane	X
Butyl benzyl phthalate	
Carbon tetrachloride	X
Chlorobenzilate	
Chloroethane	X
2-Chloroethyl vinyl ether	X
2-Chlorophenol	
Cyclohexanone	
o,p -DDE	
p,p DDT	
1,2-Dibromo-3-chloropropane	X
m-Dichlorobenzene	X
Dichlorodifluoromethane	X
1,1-Dichloroethylene	X
2,6-Dichlorophenol	
trans-1,3-Dichloropropylene	X
p-Dimethylaminoazobenzene	
Di-n-butyl phthalate	
2,4-Dinitrophenol	
Di-n-propylnitrosamine	
Diphenylnitrosamine	
Endosulfan I	
Endrin aldehyde	
Ethyl benzene	X
Ethylene oxide	X
Fluorene	
Hexachlorodibenzo-p-dioxins	
Indeno (1,2,3-c,d) pyrene	
Isodrin	
Methacrylonitrile	
3-Methylcholanthrene	

Hazardous Constituents	CCVOC
Acenaphthylene	
Acetophenone	
Acrylonitrile	X
4-Aminobiphenyl	
Aramite	
delta-BHC	
Benzal chloride	
Benzo(b)Fluoranthene	
bis(2-Chloroethoxy)methane	
bis(2-Ethylhexyl)phthalate	
4-Bromophenyl phenyl ether	
2-sec-Butyl-4,6-dinitrophenol	
p-Chloroaniline	
2-Chloro-1,3-butadiene	X
Chloroform	X
Chloromethane	X
3-Chloropropylene	
o,p -DDD	
p,p -DDE	
Dibenz(a,h)anthracene	
1,2-Dibromoethane	X
o-Dichlorobenzene	X
1,1-Dichloroethane	X
trans-1,2-Dichloroethylene	X
1,2-Dichloropropane	X
Dieldrin	
2,4-Dimethyl phenol	
1,4-Dinitrobenzene	
2,6-Dinitrotoluene	
1,4-Dioxane	X
1,2-Diphenylhydrazine	
Endosulfan II	
2-Ethoxyethanol (F005)	
Ethyl ether	X
Famphur	
Hexachlorobutadiene	X
Hexachlorodibenzofurans	
Iodomethane	
Isosafrole	
Methanol	X
4,4-Methylene bis	

Hazardous Constituents	CCVOC
Acetone	X
2-Acetylaminofluorene	
Acrylamide	
Aniline	
alpha-BHC	
gamma-BHC	
Benzene	X
Benzo(k)fluoranthene	
bis(2-Chloroethyl)ether	
Bromodichloromethane	X
n-Butyl alcohol	X
Carbon disulfide	
Chlorobenzene	X
Chlorodibromomethane	X
p-Chloro-m-cresol	
2-Chloronaphthalene	
Chrysene	
p,p -DDD	
o,p -DDT	
Dibenz(a,e)pyrene	
Dibromomethane	X
p-Dichlorobenzene	X
1,2-Dichloroethane	X
2,4-Dichlorophenol	
cis-1,3-Dichloropropylene	X
Diethyl phthalate	
Dimethyl phthalate	
4,6-Dinitro-o-cresol	
Di-n-octyl phthalate	
Diphenylamine	
Disulfoton	
Endosulfan sulfate	
Ethyl acetate	X
Ethyl methacrylate	
Fluoranthene	
Hexachlorocyclopentadiene	
Hexachloropropylene	
Isobutyl alcohol (Isobutanol)	X
Kepone	
Methapyrilene	
Methylene chloride	X

Hazardous Constituents	CCVOC
Methyl ethyl ketone	X
Methyl methansulfonate	
2-Naphthylamine	
5-Nitro-o-toluidine	
2-Nitropropane(F005)	
N-Nitroso-di-n-butylamine	
N-Nitrosopiperidine	
Pentachlorobenzene	
Pentachloroethane	
Phenanthrene	
Phthalic acid	
Propanenitrile (Ethyl cyanide)	X
Safrole	
Tetrachlorodibenzofurans	
Tetrachloroethylene	X
Tribromomethane (Bromoform)	X
1,1,2-Trichloroethane	X
2,4,5-Trichlorophenoxyacetic acid	
tris-(2,3-Dibromopropyl) phosphate	
A2213	
Bendiocarb	
Butylate	
Carbofuran	
m-Cumenyl methylcarbamate	
Dimetilan	
Formetanate hydrochloride	
Isolan	
Metolcarb	
Oxamyl	
Physostigmine	
Propham	
Thiodicarb	
Trialiate	
Allyl alcohol	X
Bromochloromethane	X
sec-Butyl benzene	X
2-Chloroethanol	X
4-Chlorotoluene	X
1,3-Dichloropropane	X
1,1-Dichloropropene	X
Ethylene glycol	X
Isopropyl alcohol (2-propanol)	X
Paraldehyde	X
Propionitrile	X
Styrene	X
1,2,4-Trimethyl benzene	X

Hazardous Constituents	CCVOC
Methyl isobutyl ketone	X
Methyl parathion	
o-Nitroaniline	
o-Nitrophenol	
N-Nitrosodiethylamine	
N-Nitrosomethylethylamine	
N-Nitrosopyrrolidine	
Pentachlorodibenzo-p-dioxins	
Pentachloronitrobenzene	
Phenol	
Phthalic anhydride	
Pyrene	
1,2,4,5-Tetrachlorobenzene	
1,1,1,2-Tetrachloroethane	X
2,3,4,6-Tetrachlorophenol	
1,2,4-Trichlorobenzene	X
Trichloroethylene	X
1,2,3-Trichloropropane	X
Vinyl chloride	X
Aldicarb sulfone	
Bendiocarb phenol	
Carbaryl	
Carbofuran phenol	
Cycloate	
Dithiocarbamates (total)	
Formparanate	
Methiocarb	
Mexacarbate	
Pebulate	
Physostigmine salicylate	
Propoxur	
Thiophanate-methyl	
Triethylamine	
Benzyl chloride	X
tert-Butyl alcohol	X
tert-Butyl benzene	X
Chloromethyl methyl ether	X
Crotonaldehyde	X
2,2-Dichloropropane	X
Epichlorhydrin	X
Hexafluoro-2-methyl-2-propanol	X
p-Isopropyl toluene	X
2-Pentanone	X
1-Propanol	X
o-Toluidine	X
1,3,5-Trimethyl benzene	X

Hazardous Constituents	CCVOC
Methyl methacrylate	
Naphthalene	X
p-Nitroaniline	
p-Nitrophenol	
N-Nitrosodimethylamine	
N-Nitrosomorpholine	
Parathion	
Pentachlorodibenzofurans	
Phenacetin	
Phorate	
Pronamide	
Pyridine	X
Tetachlorodibenzo-p-dioxins	
1,1,2,2-Tetrachloroethane	X
Toluene	X
1,1,1-Trichloroethane	X
Trichloromonofluoromethane	
1,1,2-Trichloro- 1,2,2-Trifluoroethane	
Xylenes	X
Barban	
Benomyl	
Carbenzadim	
Carbosulfan	
Diethylene glycol, dicarbamate	
EPTC	
3-Iodo-2-propynyl n-butylcarbamate	
Methomyl	
Molinate	
o-Phenylenediamine	
Promecarb	
Prosulfocarb	
Tirpate	
Bromobenzene	X
Bromoacetone	X
n-Butyl benzene	X
2-Chloroacrylonitrile	X
2-Chlorotoluene	X
cis-1,2-Dichloroethylene	X
1,3-Dichloro-2-propanol	X
Ethanol	X
Hexafluoro-2-propanol	X
Isopropylbenzene	X
2-Picoline	X
n-Propylbenzene	X
1,2,3-Trichlorobenzene	X

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lote 1. Volatile organic compound (CCVOC) per 40 CFR 265 Subpart CC.

Company Name U.S. Environmental Protection Agency Waste Name Contaminated Soil

Signed Mike Towle Date 12-14-00

Printed Name Mike Towle Title On-Scene Coordinator

See Analytical

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Coordination #

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FORM 25R
SOURCE REDUCTION STRATEGY

DEP USE ONLY

Application or Facility ID # _____
(Assigned by DEP)

Stamp Date Application Received

This form provides guidance on the content and format of the written source reduction strategy (SRS). Supplemental guidance on the comprehensive process of analyzing the processes by which waste is generated and developing and evaluating source reduction options is available from the Department in a separate document, the "Source Reduction Strategy Manual." The written SRS is intended to summarize the results of a comprehensive internal process of source reduction assessments and decisions. Generally, a separate SRS should be prepared for each type of waste stream generated. The strategy may be prepared on this form or prepared on separate paper using this format.

Source reduction is the reduction or elimination of the quantity or toxicity of residual waste before it is generated. Source reduction may be achieved through changes within the production process, including process modifications, feedstock substitutions, improvements in feedstock purity, shipping and packing modifications, housekeeping and management practices, increases in the efficiency f machinery, and recycling within a process. Please note that source reduction does not include dewatering, compaction, waste reclamation, or the use or reuse of waste. These activities, although they can result in environmental benefit, are of lower priority in the waste management hierarchy and should not be included in the SRS. These processing, use, and reclamation activities are encouraged through the permit-by-rule and beneficial use provisions of the residual waste regulations.

Residual Waste Requirements

Small quantity generators, who generated less than 2,200 pounds of all residual waste in each month of the previous year, are not required to prepare an SRS.

The Department is hereby waiving for a period of two years the SRS requirement for individual waste types that are generated in quantities of less than 2,200 pounds per month per generating location. This will enable generators to concentrate first on larger waste streams where greater environmental and economic benefits can be attained through successful source reduction. This waiver will be reconsidered two years from the effective date of the residual waste regulations.

A residual waste SRS was to be completed by July 4, 1993.

Hazardous Waste Requirements

Small quantity generators, who generate a total of less than 1,000 kilograms of hazardous waste in each month of the previous year, are exempt from the SRS requirements.

There is no exemption in the hazardous waste regulations for individual waste streams generated in small quantities, as outlined for residual waste above.

The hazardous waste SRS was to be completed by January 17, 1994.

The SRS must be available on-site for inspection and must be submitted:

- with a Form U or Module 1 (for the disposal or processing of waste at a permitted site)
- with a Form S (for the disposal or processing of municipal-like residual waste at a permitted site).
- with a permit application
- upon request by the department

Regulatory References:

Hazardous Waste Regulations
§260.2 (definition of "source reduction")
§262.80 (source reduction strategy)
§264.13(a)(7) (General Requirements)

Municipal Waste Regulations
§ 271.1 (definition of "source reduction")
§ 271.612 (Additional Application Requirements)

Residual Waste Regulations
§ 287.53 (duties of generators: source reduction strategy)
§ 287.1 (definition of "source reduction")
§ 287.52(b)(6) (biennial reports)
§ 287.733 (waste analysis: source reduction strategy)

SRS Options:

1. If you have established a source reduction program and know what action you will take to reduce this waste stream then the general information and Part A should be completed.
2. If you are proposing to do nothing to reduce the quantity or toxicity of waste, then the general information and Part B should be completed.
3. If you have established a program but are still evaluating what you will do, you should complete the general information plus the applicable sections of both parts A and B. You should present the ongoing source reduction evaluations which will lead to a completed strategy. This third option may only be used for one year following the effective date of the regulations.

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FORM 25R

SECTION A. APPLICANT IDENTIFIER

Applicant Name: U.S. Environmental Protection Agency Region III

SECTION B. GENERAL INFORMATION

This section must be completed.

Generator: U.S. Environmental Protection Agency
Contact Person: Mike Towle (3HS31)
Phone Number: 215 814 3272
Mailing Address: 1650 Arch Street
Philadelphia, PA 19103-2020

Facility Address: 12th Street
(If different from mailing address) Wilmington, DE
Facility SIC Code(s): N/A

The information contained in this form is true and correct to the best of my knowledge and belief.

Mike Towle
Name of Responsible Official

Signature of Responsible Official

12-14-00
Date

1. Waste stream name and description: ☐ Residual waste ☒ Hazardous waste

Metals Contaminated Soil
See attached Analytical data

2. Describe source reduction actions taken during the past five years. You should quantify any reduction in the weight or toxicity of waste and maintain records to document this reduction. This question is intended to give recognition for past source reduction achievements.

N/A - One time clean-up

3. State whether you have established a source reduction program. You may include a statement of top management's support or corporate source reduction goals.

N/A - One time clean-up

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Coordination #

SECTION C.

Complete this section if you have established a source reduction program and are proposing to take action to reduce the quantity or toxicity of this waste.

1. Describe the methods and procedures that you will use to achieve source reduction for this waste.

N/A - One time clean-up

2. Quantify the projected reduction by weight or toxicity for each technique described in #1. You may use the method of measurement most appropriate for the waste and the generating process. Discussion of several measurement options is contained in the "Source Reduction Strategy Manual."

N/A - one time clean-up

3. Specify when each method or procedure described in #1 will be implemented.

N/A - One time clean-up

Summary of Section C

method or procedure	expected reduction	implementation date

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Coordination #

SECTION D.

Complete this section only if you have not established a source reduction program for this waste stream, that is, if you are not proposing to take any action to reduce the quantity or toxicity of the waste.

1. **Characterize the wast stream, including source, hazards, properties, generation rate, and current management techniques and costs. Attach chemical analyses or other documentation as needed to fully describe the identify and source of waste.**

Contaminated Soil from abandoned hand Fill site. EPA is mitigating the potential environmental/human health threat with a one time removal operation. See Attached analytical data of removed soil.

2. Describe all the potential source reduction options that you considered.

N/A - one time clean-up

3. Describe in detail how each option was evaluated. Include the specific technical, economic, or other criteria that were used.

N/A - one time clean-up

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Coordination #

SECTION D. (continued)

4. Explain why each option was not selected.

N/A - one time clean-up

Summary of Section D

method or procedure	why not selected